

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

THOMAS E. CULLERTON

No. 19 CR 623

Hon. Robert W. Gettleman

DEFENDANT’S UNOPPOSED MOTION FOR EARLY PAYMENT OF RESTITUTION

Defendant THOMAS E. CULLERTON, through his attorney, Daniel J. Collins, respectfully moves this Court to permit Mr. Cullerton to make early payment of partial restitution with the Clerk of this Court. The government does not oppose this motion. In support of this motion, defendant state as follows:

1. As set forth in the indictment, Mr. Cullerton is charged with the embezzlement of funds from a labor organization, among other offenses. Mr. Cullerton is scheduled to change his plea on March 8, 2022.

2. Mr. Cullerton wishes to make partial payment of restitution by depositing funds with the Clerk of this Court in advance of his conviction and sentencing.

3. Pursuant to 28 U.S.C. § 2041, the Court may order the Clerk of Court to accept from Mr. Cullerton or his designated representative payment of criminal financial obligations, including restitution, and maintain such payment on deposit in the Court’s registry until the time of entry of the judgment on the docket in this case. Deposits of early restitution shall be made payable to the Clerk of the United States District Court for the Northern District of Illinois.

4. Pursuant to 28 U.S.C. § 2042, upon entry of a criminal judgment in this case, the Court may order the Clerk of Court to withdraw and apply funds deposited by Mr. Cullerton, together with any interest that has accrued, and after deduction for any required registry fees, to

the criminal financial obligations imposed against Cullerton.

5. The undersigned has communicated with counsel for the government, who has indicated that it does not oppose this motion.

6. A proposed draft order granting the motion has been submitted electronically to the Court's proposed order e-mail inbox.

WHEREFORE, defendant respectfully ask the Court to enter an order granting Mr. Cullerton leave to make early payment of partial restitution by depositing funds with the Clerk of the United States District Court for the Northern District of Illinois.

Dated: March 7, 2022

Respectfully submitted,

THOMAS E. CULLERTON

By: /s/ Daniel Collins
Katten Muchin Rosenman LLP
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Chicago, IL 60661
312-902-5434

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2022, I caused copies of the foregoing **AGREED MOTION FOR EARLY PAYMENT OF RESTITUTION OF DEFENDANT THOMAS E. CULLERTON** to be served on all counsel of record by filing electronic copies with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered CM/ECF users.

 /s/ Daniel Collins